

**ORIGINAL**  
FILED  
JUL 18 2010

*Ed Smith*  
CLERK OF THE SUPREME COURT  
STATE OF MONTANA

IN THE SUPREME COURT OF THE STATE OF MONTANA

DA 10-0156

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STATE OF MONTANA,  
Plaintiff and Appellee

**FILED**

JUL 28 2010

V.

*Ed Smith*  
CLERK OF THE SUPREME COURT  
STATE OF MONTANA

KAREN DANIEL-KNOLL,  
Defendant and Appellant

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**MOTION FOR APPOINTMENT OF CONFLICT-FREE COUNSEL**

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On Appeal from Montana First Judicial District Court,  
Lewis & Clark County, the Honorable Kathy Seeley, Presiding

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Appearance:

**KAREN DANIEL-KNOLL**  
Pro Se Litigant  
1001 South 27<sup>th</sup> Street  
Billings, MT 59101

**STEVE BULLOCK**  
Montana Attorney General  
215 North Sanders  
Helena, MT 59620-1401

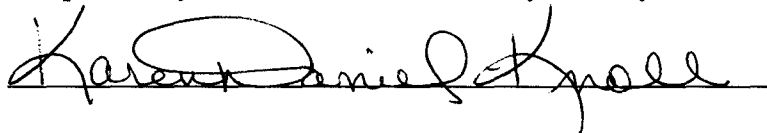
**LEWIS & CLARK**  
**COUNTY ATTORNEY**  
228 Broadway  
Helena, MT 59601

The Defendant respectfully requests the appointment of conflict-free counsel, a guarantee of the U.S. Constitution and of the State of Montana Constitution. As support thereof the defendant states the following:

1. The Defendant is currently incarcerated at the Passages Pre-Release Center in Billings, Montana, in the capacity of Inmate Worker.
2. The Defendant was represented during the judicial proceedings by the Public Defender's Office.
3. The Defendant has no skill at the law and needs the counsel and assistance of legal counsel.
4. The Defendant has little funds.

The Defendant respectfully requests this Honorable Court appoint conflict-free counsel to aid her in her defense and representation of her case.

Respectfully submitted this 27<sup>th</sup> day of July, 2010.

A handwritten signature in black ink, appearing to read "Karen Daniel-Knoll", written over a horizontal line.

Karen Daniel-Knoll  
1001 South 27<sup>th</sup> Street  
Billings, MT 59101

## **CERTIFICATE OF MAILING**

I hereby certify that I caused a true and correct copy of the foregoing  
**MOTION FOR APPOINTMENT OF CONFLICT-FREE COUNSEL**  
to be mailed to:

Steve Bullock  
Montana Attorney General  
215 North Sanders  
P.O. Box 201401  
Helena, MT 59620-1401

Lewis & Clark County Attorney  
228 Broadway  
Helena, MT 59601